

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

_____)	
UNITED STATES OF AMERICA)	
)	CASE NO. 04CR10217GAO
v.)	
)	
DARREN F. WILDER)	
_____)	

**DEFENDANT'S MOTION FOR ADDITIONAL TIME
TO CONDUCT DEFENSE INVESTIGATION**

NOW COMES the Defendant, Darren Wilder, ("Wilder"), through counsel, and hereby respectfully moves this Honorable Court for additional time to conduct a defense investigation of the facts and circumstances surrounding the instant case. In support thereof counsel states the following:

1. The Parties engaged in initial discovery pursuant to the Local Rules prior to the filing of the Defendant's first Motion to Suppress Evidence.
2. This is a case in which the Defendant will need the assistance of several computer and graphics experts at trial in order to meet the Government's evidence.
3. prior to the expenditure of substantial sums to retain said experts, and pursue a defense investigation of the contents of Mr. Wilder's hard drive, undersigned counsel felt it was more economically prudent to file the Motion to Suppress Evidence with the Court, which may have dispositive.
4. The Court denied the Defendant's Motion to Suppress Evidence on May 6, 2005.
5. The undersigned counsel anticipates a lengthy investigation of the contents of Mr. Wilder's hard drive, which the Government has had in its possession since January of 2004.

6. Defendant has requested and received access to the computer.

7. Defendant has also made a recent request for immunity from the Government in order to pursue a more detailed investigation of the content of Mr. Wilder's hard drive, which may necessitate the ---, transmission and possession of materials in violation of 18 U.S.C. § 2252(a)(1)- ----.

8. Further motions in this Court may be necessary in order to protect the Defendant's rights to investigate the nature of the charges against him and his request for limited immunity.

WHEREFORE based on the foregoing arguments and authorities this Honorable Court is respectfully urged to grant the Defendant a reasonable period of time to conduct a defense investigation into the contents of Mr. Wilder's hard drive.

Respectfully submitted,



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CERTIFICATE OF SERVICE

I, Peter Charles Horstmann, Esquire, hereby certify that on this 3rd day of June, 2005, a copy of the foregoing DEFENDANT'S MOTION FOR ADDITIONAL TIME TO CONDUCT DEFENSE INVESTIGATION was served electronically upon Sherri Stephan, Trial Attorney, United States Attorneys Office, One Courthouse Way, Boston, MA 02210



Peter Charles Horstmann, Esquire